

Exhibit A

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FACEBOOK, INC., a Delaware corporation
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 In re FACEBOOK PPC Advertising
13 Litigation,

Master File Case No. C 09-03043 PJH

14 This Document relates To:
15 All Actions.

**DECLARATION OF ROBERT KANG-XING JIN
IN SUPPORT OF FACEBOOK, INC.'S
OPPOSITION TO PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

16
17
18 I, Robert Kang-Xing Jin, declare as follows:

19 1. I am a Director of Engineering at Facebook, Inc. ("Facebook"). I am familiar with
20 Facebook's internal decision-making process and strategies related to Pay-Per-Click ("PPC")
21 advertising, including the development of Facebook's advertising platform, some of Facebook's
22 "click filters" and methods for identifying clicks that are not billed to advertisers, and some of the
23 methods by which Facebook attempts to help advertisers realize value from their advertisements.
24 I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and
25 would competently testify thereto.

26
27 2. [REDACTED]
28

1 [REDACTED]
2 [REDACTED]
3 This has been the case throughout the class period (which I understand
4 commences in May 2009) and even earlier. [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 3. [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 4. [REDACTED]
12 [REDACTED]
13 [REDACTED]

Facebook's Click Filters

14
15 5. Facebook also utilizes automated systems (known as "click filters") that are
16 designed to detect certain types of clicks and prevent them from being charged to its PPC
17 advertisers. [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 6. [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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[REDACTED]

7.

[REDACTED]

Notably, the user clicking on the advertisements in these circumstances is still directed to the designated landing page for each advertisement even if the click filter is applied, meaning the advertiser is charged nothing for the benefits that may result from any clicks that are filtered.

[REDACTED]

8.

[REDACTED]

**Methods By Which Facebook
Addresses Click-Related Issues**

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[REDACTED]

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 24th day of October, 2011 in Palo Alto, California.

/s/ Robert Kang-Xing Jin
Robert Kang-Xing Jin

Filer's Attestation: Pursuant to General Order No. 45, §X(B), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from its signatory.

Dated: October 24, 2011

Respectfully submitted,

/s/ Whitty Somvichian
Whitty Somvichian
Counsel for Facebook, Inc.